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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,)

12 Plaintiff,)

13 v.)

14 DONNA M. GRAFFAGNINO,)

15 Defendant.)

Case No.

CONSENT JUDGMENT

16 WHEREAS, Plaintiff United States of America, on behalf of the United States Air Force
17 ("USAF"), filed a Complaint initiating this action against Defendant Donna M. Graffagnino;

18 WHEREAS, the United States alleges that Defendant unlawfully and fraudulently obtained and
19 used travel reimbursement funds from the USAF by submitting approximately 13 travel vouchers to
20 Defense Travel Services and falsely stated in each the mileage and destinations she traveled in the
21 course of her official duties;

22 WHEREAS, the United States further alleges that Defendant knew each of the 13 separate travel
23 vouchers she submitted to the Defense Travel Services were false or fraudulent, because Defendant
24 admitted that between the time period of January 2012 and November 2012, Defendant claimed official
25 travel to work-related locations, but would instead travel to various other locations unrelated to her
26 official duties, or to her home;

1 WHEREAS, the United States further alleges that Defendant's false statements and fraudulent
2 claims were material to the USAF's payment of benefits in the amount of \$3,338.00;

3 WHEREAS, Defendant does not contest the accuracy of these allegations or any allegations set
4 forth in the Complaint filed in this action,

5 **THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED** as follows:

- 6 1. This court has jurisdiction over this matter under 31 U.S.C. § 3732 and 28 U.S.C. §§
7 1331, 1345, and 1355, and Defendant acknowledges and accepts service of the Complaint
8 in this action.
- 9 2. Defendant acknowledges her liability to the United States and agrees to the entry of
10 Judgment in the amount of \$6,676.00, which represents the government's double
11 damages of \$3,338.00, in connection with Defendant's fraudulent receipt of USAF travel
12 reimbursement benefits to which Defendant was not entitled and as is more fully set out
13 in the Complaint filed in this action.
- 14 3. Defendant agrees to notify the United States Attorney's Office within 30 days of any
15 change of address, telephone number, or employment until the judgment debt is paid in
16 full, by providing such information to: United States Attorney's Office, 333 Las Vegas
17 Boulevard South, Suite 5000, Las Vegas, Nevada 89101.
- 18 4. The United States will record a judgment lien against Defendant to secure payment of
19 this judgment debt. Without otherwise limiting enforcement of the judgment, the
20 proceeds from the sale of any real estate in which Defendant has an interest may be used
21 to satisfy a portion or all of this judgment debt.
- 22 5. Defendant admits and acknowledges that her actions, which gave rise to the present
23 dispute between the parties, constitute false pretenses, false representations, and/or fraud
24 that resulted in her obtaining travel reimbursement benefits from the USAF to which she
25 was not entitled, and agrees and acknowledges that the debt owed to the United States as
26 set forth herein is non-dischargeable in bankruptcy under 11 U.S.C. § 523.

